



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking Regarding Policies, )  
Procedures and Incentives for Distributed )  
Generation and Distributed Energy Resources )  
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Rulemaking 04-03-017

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO  
FUELCELL ENERGY'S PETITION FOR MODIFICATION OF DECISION 04-12-045

JAMES M. LEHRER  
ROBERT F. LEMOINE

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3252  
Facsimile: (626) 302-7740  
E-mail: Robert.F.Lemoine@sce.com

Dated: **August 24, 2007**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,	)	
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**I.**

**INTRODUCTION AND SUMMARY**

Pursuant to Rule 16.4 of the California Public Utilities Commission's (Commission or CPUC) Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully files its response to the July 25, 2007 Petition for Modification of Decision 04-12-045 (Petition) filed by FuelCell Energy (FCE).

Current Self Generation Incentive Program (SGIP) rules allow customers to size their generators up to 5 Megawatts (MWs), but customers may only receive SGIP incentives for the first 1 MW. FuelCell Energy has requested a modification to this rule to allow customers to receive incentives for up to 3 MWs of generation capacity. SCE recommends that the Commission adopt the increase in the incentive cap sought in FCE's Petition for Modification of Decision 04-12-045 with respect to fuel cells operating on renewable fuel, but deny the increase with respect to all other SGIP technologies for the following reasons: (i) although FCE's Petition is not limited to fuel cells, FCE's arguments in support of raising the incentive cap only mention fuel cells operating on renewable fuel; and (ii) raising the incentive cap on all SGIP technologies without separate evidentiary justification risks depleting program funds on large,

non-renewable fuel projects. Thus, if the Commission decides to raise the incentive cap, it should do so only for renewable energy fuel cells – the technology specifically mentioned in FCE’s Petition.

## **II.**

### **FCE’S REQUEST TO RAISE THE SGIP INCENTIVE CAP SHOULD APPLY TO FUEL CELLS OPERATING ON RENEWABLE FUEL ONLY**

Although FCE’s examples in its Petition describe renewable energy fuel cell applications such as wastewater treatment facilities, the Petition itself seeks to raise the cap on all SGIP technologies (using renewable and non-renewable fuels), not just fuel cells. FCE, however, does not explain or provide any support for raising the limits on any other technologies. Therefore, if the Commission decides to grant FCE’s Petition and raise the incentive cap, it should do so for Level 1 Fuel Cells only, that is, for projects employing fuel cells operating on renewable fuel only. The Commission should not raise the cap on any other technology in the absence of a specific proposal supported by a showing, as required by Rule 16.4(b), justifying the increased incentives for the technology at issue.

## **III.**

### **RAISING THE INCENTIVE CAP ON OTHER SGIP TECHNOLOGIES RISKS DEPLETING PROGRAM FUNDS ON LARGE, NON-RENEWABLE FUEL PROJECTS**

According to the Commission, principal among the reasons for the 1 MW incentive limit is that increasing the incentive cap would allow a few projects to receive some, if not all, of the SGIP incentive budget. For example, in its original Decision (D.) 01-03-073, the Commission established a system size cap of 1 MW. In that decision, the CPUC stated:

“In our judgment, a system size limit of 1 MW will effectively address the concerns raised by NRDC and others. This size represents a fairly large installation for a single customer site and, at the same time, will not use up an unreasonable amount of program funding. We note that one system of this maximum size would only receive about one-third of the available funding in SDG&E’s service territory, which is the smallest budgeted program. Individual customers may apply for incentives for more

than one system, as long as the combined size does not exceed 1 MW.” (March 27, 2001).

In a later decision, the Commission allowed projects sized up to 1.5 MWs, but did not increase the system size eligible for incentives.

“By today’s decision, we make certain modifications and clarifications to D.01-03-073. Based on Kawasaki’s Petition, we change the maximum project size and corporate parent limit for self-generation incentives from 1 megawatt (MW) to 1.5 MWs. However, we do not modify the current cap on the incentives that any single project can receive. This change conforms the project size limit to the scales and sizes of units in the market, while still assuring a broad dispersion of program funds”. See D.02-02-026 (February 7, 2002).

In a subsequent decision, the decision FCE’s Petition seeks to modify, the project size cap was increased to 5 MW, but the Commission again retained the 1 MW limitation on incentives.

“We adopt Energy Division’s proposal to increase maximum eligible capacity size to 5 megawatts, effective January 1, 2005. Increasing capacity size will allow developers, customers, utilities, and ratepayers to receive cost savings achieved by larger projects. However, we will continue to limit incentive payments to 1 MW of capacity. We share PG&E’s concern that increasing incentive payments from 1 MW to 5 MW would allow only a few projects, particularly Level 3 technologies, to receive incentives before depleting a program administrator’s entire annual budget.” See D.04-12-045 (December 16, 2004).

The purpose of limiting incentive payments to 1 MW of system capacity is to prevent a few projects from reserving and collecting most of the program incentives. Therefore, the increase in the incentive cap sought by FCE should be limited to renewable energy fuel cell projects. For this reason, SCE recommends that FCE’s request for an incentive cap increase be adopted for fuel cells operating on renewable fuel but not for other SGIP technologies without further justification by separate petition pursuant to Rule 16.4(b).

**IV.**

**CONCLUSION**

SCE appreciates the opportunity to submit this response. For the reasons stated herein, FCE's Petition to increase the SGIP incentive cap should be adopted with respect to fuel cells operating on renewable fuel only.

Respectfully submitted,

JAMES M. LEHRER  
ROBERT F. LEMOINE

/s/ ROBERT F. LeMOINE

By: Robert F. LeMoine

---

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3252  
Facsimile: (626) 302-7740  
E-mail: Robert.F.Lemoine@sce.com

August 24, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO FUELCELL ENERGY'S PETITION FOR MODIFICATION OF DECISION 04-12-045 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **24th day of August, 2007**, at Rosemead, California.

/S/ CHRISTINA A. SANCHEZ  
Christina A. Sanchez  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770

**R.04-03-017**

Friday, August 24, 2007

ABBAS M. ABED  
ASSOCIATE DIRECTOR  
NAVIGANT CONSULTING, INC.  
402 WEST BROADWAY, SUITE 400  
SAN DIEGO, CA 92101  
R.04-03-017

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-03-017

Zaida Amaya-Pineda  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
R.04-03-017

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE DIRECTOR  
UNIVERSITY OF SAN DIEGO SCHOOL OF  
LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110  
R.04-03-017

GALEN BARBOSE  
LAWRENCE BERKELEY NATIONAL LAB  
1 CYCLOTRON RD.  
BERKELEY, CA 94720  
R.04-03-017

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460  
R.04-03-017

Valerie Beck  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

TOM BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557  
R.04-03-017

GENE BECK  
ENVIROTECH FINANCIAL, INC.  
333 CITY BLVD. W 17TH FL  
ORANGE, CA 92868  
R.04-03-017

BRIAN BIERING  
RESOURCES AGENCY  
1416 NINTH STREET, SUITE 1311  
SACRAMENTO, CA 95814  
R.04-03-017

Werner M. Blumer  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

BILL BLACKBURN  
SUPERVISOR, EMERGING RENEWABLES  
PROGRAM  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH ST., MS 45  
EFFIC./RENEWABLES&DEMAND ANALYS.  
DIVISIO  
SACRAMENTO, CA 95814  
R.04-03-017

ANDY BLACK  
ONGRID SOLAR  
4175 RENAISSANCE DR., 4  
SAN JOSE, CA 95134  
R.04-03-017

SCOTT BLAISING  
ATTORNEY AT LAW  
BRAUN & BLAISING, P.C.  
915 L STREET, STE. 1270  
SACRAMENTO, CA 95814  
R.04-03-017

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICE OF WILLIAM H. BOOTH  
1500 NEWELL AVE., 5TH FLOOR  
WALNUT CREEK, CA 94556  
R.04-03-017

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-03-017

MICHAEL CAMPBELL  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MC B9A  
SAN FRANCISCO, CA 94177  
R.04-03-017

Susannah Churchill  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

STEVE CHADIMA  
ENERGY INNOVATIONS, INC.  
130 WEST UNION STREET  
PASADENA, CA 91103  
R.04-03-017

CORIE CHEESEMAN  
301 VAN BUREN APT. 14  
MONTEREY, CA 93940  
R.04-03-017

JILL K. CLIBURN  
45 CRAZY RABBIT DRIVE  
SANTA FE, NM 87508  
R.04-03-017

JEANNE CLINTON  
2232 WARD STREET  
BERKELEY, CA 94705  
R.04-03-017

ROCCO COLICCHIA  
HARRIS & ASSOCIATES  
120 MASON CIRCLE  
CONCORD, CA 94520  
R.04-03-017

DARRYL J. CONKLIN  
RENEWABLE TECHNOLOGIES  
INCORPORATED  
PO BOX 1569  
SUTTER CREEK, CA 95685  
R.04-03-017

STEVE COONEN  
CONNECT ENERGY  
14790 MOSSWOOD LANE  
GRASS VALLEY, CA 95945  
R.04-03-017

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE &  
DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-03-017

MICHAEL B. DAY  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-03-017

AMBER DEAN  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-03-017

SCOTT DEBENHAM  
DEBENHAM ENERGY LLC  
11317 VALLE VISTA ROAD  
LAKESIDE, CA 92040  
R.04-03-017

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814  
R.04-03-017

BERNADETTE DEL CHIARO  
ENVIRONMENT CALIFORNIA  
ENVIRONMENT CALIFORNIA  
1107 9TH STREET, SUITE 601  
SACRAMENTO, CA 95814  
R.04-03-017

Paul Douglas  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

Dorothy Duda  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5109  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

HARVEY EDER  
PUBLIC SOLAR POWER COALITION  
1218 12TH ST., 25  
SANTA MONICA, CA 90401  
R.04-03-017

CHRISTOPHER T. ELLISON  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-03-017

ROB ERLICHMAN  
SUNLIGHT ELECTRIC, LLC  
2001 PIERCE STREET, STE. 62  
SAN FRANCISCO, CA 94115  
R.04-03-017



**R.04-03-017**

Friday, August 24, 2007

CLAY FABER  
SAN DIEGO GAS & ELECTRIC COMPANY  
555 WEST FIFTH STREET, GT14D6  
LOS ANGELES, CA 90013  
R.04-03-017

DIANE I. FELLMAN  
ATTORNEY AT LAW  
FPL ENERGY, LLC  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102  
R.04-03-017

Julie A Fitch  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
EXECUTIVE DIVISION ROOM 5203  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

LAW DEPARTMENT FILE ROOM  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
R.04-03-017

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123  
R.04-03-017

Hazlyn Fortune  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

PATRICK J. FORKIN III  
TEJAS SECURITIES  
7700 BONHOMME AVE. STE 575  
CLAYTON, MO 63105  
R.04-03-017

TONY FOSTER  
ITRON INC.  
1111 BROADWAY, STE 1800  
OAKLAND, CA 94607  
R.04-03-017

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
R.04-03-017

SUSAN FREEDMAN  
SAN DIEGO REGIONAL ENERGY OFFICE  
8520 TECH WAY, SUITE 110  
SAN DIEGO, CA 92123  
R.04-03-017

LORI A. GLOVER  
PRESIDENT  
S.O.L.I.D. USA, INC.  
10645 N. TATUM BLVD., SUITE 200-306  
PHOENIX, AZ 85028  
R.04-03-017

NOAH GOLDEN  
GOLDEN ENERGY  
2630 LA CIENEGA AVE.  
LOS ANGELES, CA 90034  
R.04-03-017

STEVEN A. GREENBERG  
DISTRIBUTED ENERGY STRATEGIES  
4100 ORCHARD CANYON LANE  
VACAVILLE, CA 95688  
R.04-03-017

HILLARY GROSS  
CAMPAIGN & ADVOCACY COORDINATOR  
GLOBAL GREEN USA  
2218 MAIN STREET, 2ND FLOOR  
SANTA MONICA, CA 90405  
R.04-03-017

MICHAEL HALL  
BORREGO SOLAR SYSTEMS  
727 ALLSTON WAY, SUITE B  
BERKELEY, CA 94710  
R.04-03-017

TOM HAMILTON  
EXECUTIVE DIRECTOR  
CHEERS  
9400 TOPANGA CANYON BLVD., SUITE 220  
CHATSWORTH, CA 91311  
R.04-03-017

MICHELLE M. HARRISON  
ADMINISTRATIVE SERVICES MANAGER  
FIRST SOLAR HOLDINGS, LLC  
4050 E. COTTON CENTER BLVD., STE. 68  
PHOENIX, AZ 85040-8864  
R.04-03-017

ARNO HARRIS  
RECURRENT ENERGY, INC.  
220 HALLECK ST., SUITE 220  
SAN FRANCISCO, CA 94129  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

CHRIS HARRIS  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
R.04-03-017

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95816  
R.04-03-017

JIM HENDRY  
SAN FRANCISCO PUBLIC UTILITIES COMM.  
1155 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103  
R.04-03-017

Martin Homec  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

DARCIE L HOUCK  
MONTEAU & PEEBLES LLP  
1001 SECOND STREET  
SACRAMENTO, CA 95814  
R.04-03-017

HEATHER HUNT  
LAW OFFICE OF HEATHER HUNT  
242 WHIPPOORWILL LANE  
STRATFORD, CT 6614  
R.04-03-017

TAMLYN M. HUNT  
ENERGY PROGRAM DIRECTOR  
COMMUNITY ENVIRONMENTAL COUNCIL  
26 W. ANAPAMU ST., 2/F  
SANTA BARBARA, CA 93101  
R.04-03-017

MICHAEL A. HYAMS  
POWER ENTERPRISE-REGULATORY  
AFFAIRS  
SAN FRANCISCO PUBLIC UTILITIES COMM  
1155 MARKET ST., 4TH FLOOR  
SAN FRANCISCO, CA 94103  
R.04-03-017

RONALD K. ISHII  
AESC, INC.  
5927 BALFOUR COURT, SUITE 213  
CARLSBAD, CA 92008  
R.04-03-017

DRAKE JOHNSON  
MANAGER, RENEWABLE ENERGY OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 45  
SACRAMENTO, CA 95814-5512  
R.04-03-017

MARK JOHNSON  
GOLDEN SIERRA POWER  
PO BOX 551432  
SOUTH LAKE TAHOE, CA 96155  
R.04-03-017

MARC D. JOSEPH  
ADAMS BRADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
R.04-03-017

WILLIAM KARAMBELAS  
V.P. OF BUSINESS DEVELOPMENT  
WESTERN REG  
FUEL CELL ENERGY, INC.  
27068 LA PAZ ROAD, NO. 470  
ALISO VIEJO, CA 92656  
R.04-03-017

SUE KATELEY  
EXECUTIVE DIRECTOR  
CALIFORNIA SOLAR ENERGY INDUSTRIES  
ASSN  
PO BOX 782  
RIO VISTA, CA 94571  
R.04-03-017

MARTIN KAY  
PROGRAM SUPERVISOR  
SOUTH COAST AIR QUALITY MANAGEMENT  
DISTR  
21865 COPLEY DR.  
DIAMOND BAR, CA 91765-3252  
R.04-03-017

GREG KENNEDY  
OCCIDENTAL POWER SOLAR AND  
COGENERATION  
3629 TARAVAL ST.  
SAN FRANCISCO, CA 94116  
R.04-03-017

BREENE KERR  
27261 SHERLOCK ROAD  
LOS ALTOS HILLS, CA 94022  
R.04-03-017

SCOTT A. KRONLAND  
ALTSHULER, BERZON, NUSSBAUM, RUBIN  
177 POST STREET, STE. 300  
SAN FRANCISCO, CA 94108  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

SUSAN KULAKOWSKI  
STANFORD UNIVERSITY  
327 BONAIR SIDING  
STANFORD, CA 94305-7272  
R.04-03-017

MICHAEL KYES  
7423 SHAUN CT.  
SEBASTOPOL, CA 95472  
R.04-03-017

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
R.04-03-017

RONALD LIEBERT  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
R.04-03-017

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA ROAD, NO. 112, PMB119  
ANTELOPE, CA 95843  
R.04-03-017

RANDY LITTENEKER  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120  
R.04-03-017

Mark R. Loy  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

CARL C. LOWER  
THE POLARIS GROUP  
717 LAW STREET  
SAN DIEGO, CA 92109-4236  
R.04-03-017

DICK LOWRY  
5901 BOLSA AVENUE  
HUNTINGTON BEACH, CA 92647  
R.04-03-017

Kim Malcolm  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5005  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

RACHEL MACDONALD  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 43  
SACRAMENTO, CA 95814  
R.04-03-017

CAROL MANSON  
SAN DIEGO GAS & ELECTRIC CO. CP32D  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123  
R.04-03-017

CHARLES MANZUK  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP 32D  
SAN DIEGO, CA 92123  
R.04-03-017

ROBERT M. MARGOLIS  
SENIOR ENERGY ANALYST  
NATIONAL RENEWABLE ENERGY  
LABORATORY  
901 D STREET, S.W., SUITE 930  
WASHINGTON, DC 20004  
R.04-03-017

KEITH MC CREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN  
1275 PENNSYLVANIA AVENUE, NW  
WASHINGTON, DC 20004-2415  
R.04-03-017

KARLY MCCRORY  
SOLAR DEVELOPMENT  
2424 PROFESSIONAL DRIVE  
ROSEVILLE, CA 95677  
R.04-03-017

JAN E. MCFARLAND  
CALIFORNIA SOLAR ENERGY INDUSTRIES  
ASSO.  
1100 11TH STREET, SUITE 323  
SACRAMENTO, CA 95814  
R.04-03-017

BRUCE MCLAUGHLIN  
ATTORNEY AT LAW  
BRAUN & BLAISING P.C.  
915 L STREET, SUITE 1420  
SACRAMENTO, CA 95814  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

LIZ MERRY  
EXECUTIVE DIRECTOR  
NORCAL SOLAR  
2402 WESTERNESSE RD.  
DAVIS, CA 95616  
R.04-03-017

SANFORD MILLER  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 45  
SACRAMENTO, CA 95814  
R.04-03-017

MICHAEL D. MONTOYA  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-03-017

JERRY MOORE  
CONNECT ENERGY  
1050 WHISPERING PINES LN STE F  
GRASS VALLEY, CA 95945-5954  
R.04-03-017

FREDERICK MORSE  
MORSE ASSOCIATES, INC.  
1808 CORCORAN ST., NW  
WASHINGTON, DC 20009  
R.04-03-017

MEGAN MACNEIL MYERS  
LAW OFFICES OF SARA STECK MYERS  
PO BOX 638  
LAKEPORT, CA 95453  
R.04-03-017

SARA STECK MYERS  
ATTORNEY AT LAW  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121  
R.04-03-017

LES NELSON  
WESTERN RENEWABLES GROUP  
30012 AVENTURA, SUITE A  
RANCHO SANTA MARGARITA, CA 92688  
R.04-03-017

CHRISTOPHER O'BRIEN  
SHARP SOLAR  
VP STRATEGY AND GOVERNMENT  
RELATIONS  
3808 ALTON PLACE NW  
WASHINGTON, DC 20016  
R.04-03-017

CORY O'CONNOR  
REDWOOD COAST ENERGY AUTHORITY  
517 5TH ST.,  
EUREKA, CA 95501  
R.04-03-017

THOMAS W. OAKES, PHD  
SOLAR HYDROGEN CO.  
10303 CENTINELLA DR.  
LA MESA, CA 91941  
R.04-03-017

FREDERICK M. ORTLIEB  
OFFICE OF CITY ATTORNEY  
CITY OF SAN DIEGO  
1200 THIRD AVENUE, SUITE 1100  
SAN DIEGO, CA 92101  
R.04-03-017

Lisa Paulo  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

ROBERT PANORA  
TECOGEN, INC.  
45 FIRST AVENUE  
WALTHAM, MA 2451  
R.04-03-017

LAURIE PARK  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078  
R.04-03-017

PETER T. PARRISH  
CALIFORNIA SOLAR ENGINEERING, INC.  
820 CYNTHIA AVE.  
LOS ANGELES, CA 90065  
R.04-03-017

STEVEN D. PATRICK  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA GAS/SDG&E  
555 WEST 5TH STREET, GT14E7  
LOS ANGELES, CA 90013-1034  
R.04-03-017

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, SUITE 1500  
LOS ANGELES, CA 90071  
R.04-03-017

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Friday, August 24, 2007

ANN PETERSON  
TECHNOLOGY SYSTEMS DIVISION  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 45  
SACRAMENTO, CA 95814  
R.04-03-017

JENNIFER PORTER  
POLICY AND OUTREACH MANAGER  
CALIFORNIA CENTER FOR SUSTAINABLE  
ENERGY  
8690 BALBOA AVENUE, STE. 100  
SAN DIEGO, CA 92123  
R.04-03-017

Terrie D Prosper  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5301  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

BARBARA QUITTNER  
785 EAST 820 SOUTH  
PLEASANT GROVE, UT 84062  
R.04-03-017

EDWARD RANDOPLH  
ASSEMBLY UTILITIES AND COMMERCE  
COMMITTEE  
STATE CAPITOL  
SACRAMENTO, CA 95814  
R.04-03-017

ERIN RANSLOW  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078  
R.04-03-017

MARK RAWSON  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6201 S STREET, MS B257  
SACRAMENTO, CA 95817  
R.04-03-017

JOHN R. REDDING  
ARCTURUS ENERGY CONSULTING, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460-9525  
R.04-03-017

KEITH ROBERTS  
CITY ENERGY MANAGER  
CITY OF SACRAMENTO  
927 10TH STREET, 300, GENERAL  
SERVICES  
SACRAMENTO, CA 95814  
R.04-03-017

CHRISTOPHER J. ROCK  
NORTHGATE AVIATION  
2826 CORY CREEK ROAD  
BUTTE VALLEY, CA 95965  
R.04-03-017

MARIA ROCK  
NORTHGATE AVIATION  
2826 CORY CREEK ROAD  
BUTTE VALLEY, CA 95965  
R.04-03-017

JAMES ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017  
R.04-03-017

JP ROSS  
DEPUTY DIRECTOR  
THE VOTE SOLAR INITIATIVE  
300 BRANNAN STREET, SUITE 609  
SAN FRANCISCO, CA 94107  
R.04-03-017

JUDITH SANDERS  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-03-017

J.A. SAVAGE  
CALIFORNIA ENERGY CIRCUIT  
3006 SHEFFIELD AVE.  
OAKLAND, CA 94602  
R.04-03-017

Don Schultz  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
RM. SCTO  
SACRAMENTO, CA 95814  
R.04-03-017

KURT SCHEUERMANN  
ITRON, INC.  
1104 MAIN STREET, SUITE 630  
VANCOUVER, WA 98660  
R.04-03-017

STEVEN R. SHALLENBERGER  
1330 SOUTH 1000 EAST  
OREM, UT 84097  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-03-017

MARK SHIRILAU  
ALOHA SYSTEMS, INC.  
14801 COMET STREET  
IRVINE, CA 92604-2464  
R.04-03-017

Anne E. Simon  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5024  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

GEORGE SIMONS  
PRINCIPAL RESEARCH CONSULTANT  
ITRON  
1104 MAIN STREET, SUITE 630  
VANCOUVER, WA 98660  
R.04-03-017

Donald R Smith  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

KARI SMITH  
POWERLIGHT CORPORATION  
2954 SAN PABLO AVENUE  
BERKELEY, CA 94706  
R.04-03-017

IRENE M. STILLINGS  
EXECUTIVE DIRECTOR  
CALIFORNIA CENTER FOR SUSTAINABLE  
ENERGY  
8690 BALBOA AVE., STE. 100  
SAN DIEGO, CA 92123  
R.04-03-017

JOHN SUGAR  
MANAGER, PUBLIC PROGRAMS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 42  
SACRAMENTO, CA 95814-5512  
R.04-03-017

Christine S Tam  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

Terrie J. Tannehill  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104  
R.04-03-017

DAN THOMPSON  
SPG SOLAR  
863 E. FRANCISCO BLVD.  
SAN RAFAEL, CA 94901  
R.04-03-017

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597  
R.04-03-017

SCOTT TOMASHEFSKY  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420  
R.04-03-017

JIAB TONGSOPIT  
ENVIRONMENTAL STUDIES DEPARTMENT  
UNIVERSITY OF CALIFORNIA, SANTA CRUZ  
1156 HIGH STREET  
SANTA CRUZ, CA 95064  
R.04-03-017

NELLIE TONG  
KEMA, INC.  
492 NINTH STREET, SUITE 220  
OAKLAND, CA 94607  
R.04-03-017

ANGELA TORR  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET, RM. 1058, B10A  
SAN FRANCISCO, CA 94105  
R.04-03-017

LUKE TOUGAS  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B9A  
SAN FRANCISCO, CA 94105  
R.04-03-017

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Friday, August 24, 2007

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER MURPHY LLC  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864  
R.04-03-017

JANE H. TURNBULL  
LEAGUE OF WOMEN VOTERS OF  
CALIFORNIA  
64 LOS ALTOS SQUARE  
LOS ALTOS, CA 94022  
R.04-03-017

TIM TUTT  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-45  
SACRAMENTO, CA 95814  
R.04-03-017

EBEN TWOMBLY  
KW ENGINEERING  
360 - 17TH STREET, SUITE 100  
OAKLAND, CA 94612  
R.04-03-017

LEE H. WALLACH  
THE INTERFAITH ENVIRONMENTAL  
COUNCIL  
THE COALITION ON THE ENVIRONMENT  
AND JEW  
3424 MOTOR AVE., STE. 100  
LOS ANGELES, CA 90034  
R.04-03-017

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
R.04-03-017

LISA WEINZIMER  
CALIFORNIA ENERGY REPORTER  
PLATTS MCGRAW-HILL  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118  
R.04-03-017

PAMELA WELLNER  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ENERGY RESOURCES BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-03-017

WILLIAM W. WESTERFIELD III  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-03-017

JOSEPH F. WIEDMAN  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-03-017

RYAN WISER  
BERKELEY LAB  
ONE CYCLOTRON ROAD  
BERKELEY, CA 94720  
R.04-03-017

DON WOOD SR.  
PACIFIC ENERGY POLICY CENTER  
4539 LEE AVENUE  
LA MESA, CA 91941  
R.04-03-017

VIKKI WOOD  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6301 S STREET, MS A204  
SACRAMENTO, CA 95817-1899  
R.04-03-017

JOSEPHINE WU  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-03-017

HUGH YAO  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. 5TH ST, GT22G2  
LOS ANGELES, CA 90013  
R.04-03-017

CATHERINE E. YAP  
BARKOVICH AND YAP  
PO BOX 11031  
OAKLAND, CA 94611  
R.04-03-017

LEGAL AND REGULATORY DEPARTMENT  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-03-017

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVE  
SAN FRANCISCO, CA 94110-1431  
R.04-03-017

**R.04-03-017**

Friday, August 24, 2007

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612  
R.04-03-017